

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CAMDEN DIVISION**

<b>IN RE: Valsartan N-Nitrosodimethylamine (NDMA), and Irbesartan Products Liability Litigation</b>	<b>MDL No. 2875 Civil No.: 19-02875 (RBK)</b>
---	---

**NOTICE OF VIDEOTAPED DEPOSITION OF  
PLAINTIFF GEORGIA FATIGATO**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Solco Healthcare U.S., LLC, Huahai U.S., Inc., and Princeton Pharmaceutical Inc. will take the deposition upon oral examination of Georgia Fatigato on December 7, 2021 at 11:00 a.m. EST, and continuing until completion, via remote deposition while the witness is at the Holiday Inn Express & Suites Romeoville - Joliet North, 722 Center Boulevard, Romeoville, IL 60446.

Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The court reporter and

videographer will be an employee or agent of Veritext Legal Solutions (“Veritext”). Counsel who wish to attend remotely should contact Veritext at [valsartan@veritext.com](mailto:valsartan@veritext.com) to arrange for login credentials to be sent to them prior to the deposition.

The attorney contact for the deposition is:

Alyson Walker Lotman  
Duane Morris LLP  
30 South 17th Street  
Philadelphia, PA 19103-4196  
(215) 979-1177  
[ALotman@duanemorris.com](mailto:ALotman@duanemorris.com)

Date: December 1, 2021

Respectfully submitted,

s/ Alyson Walker Lotman  
Alyson Walker Lotman  
Duane Morris LLP  
30 South 17<sup>th</sup> Street  
Philadelphia, PA 19103-4196  
(215) 979-1177  
[ALotman@duanemorris.com](mailto:ALotman@duanemorris.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1st day of December, 2021, a true and correct copy of the foregoing Amended Notice of Videotaped Deposition of Plaintiff Georgia Fatigato was served upon the following by e-mail, with copies to all defense counsel of record via CM/ECF:

Stacy A. Burrows  
Barton and Burrows, LLC  
5201 Johnson Drive, Suite 110  
Mission, KS 66205  
(913) 563-6253  
[stacy@bartonburrows.com](mailto:stacy@bartonburrows.com)  
*Attorneys for Plaintiff*

Clonlee Whiteley  
David Stanoch  
Kanner & Whiteley, LLC  
701 Camp Street  
New Orleans, LA 70130  
(504) 524-5777  
[c.whiteley@kanner-law.com](mailto:c.whiteley@kanner-law.com)  
[d.stanoch@kanner-law.com](mailto:d.stanoch@kanner-law.com)  
*Liaison Counsel for Plaintiffs*

Veritext Legal Solutions (via email)

s/ Alyson Walker Lotman  
Alyson Walker Lotman